

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SIXTO CASTILLO IV, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

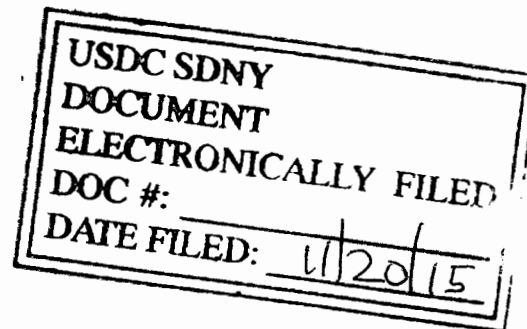
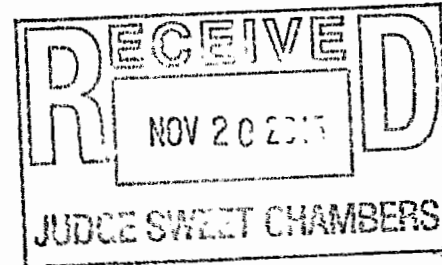
Plaintiff,

v.

6D GLOBAL TECHNOLOGIES, INC.,
NEW YORK GLOBAL GROUP, INC.,
NYGG (ASIA), LTD., BENJAMIN
TIANBING WEI A/K/A BENJAMIN WEY,
TEJUNE KANG, MARK SZYNKOWSKI,
ADAM HARTUNG, DAVID S.
KAUFMAN, TERRY MCEWEN,
ANUBHAV SAXENA, ADAM WARE,
BRIAN WARNER, DAVID SLOVINA,
GERARD CASAZZA, HILARY SMITH,
JASON PORATH, KAT TOPAZ, MIKE
TELATOVICH, TANDY HARRIS, RAY
ROBINSON, TJ IACIOFANO, BEI LU,
NAN LIU, DIANFU LU, ARNOLD
STALOFF, SHUYUAN LIU, ZILI ZHAO,
SHENG MA, FEGJUN SUN, SEREF
DOGAN ERBEK, TIANYI WEI A/K/A
SARAH WEI, MICHAELA WEI, AND
ROBERT NEWMAN,

Defendants.

Case No: 1:15-cv-08061 (RWS)



**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
COMPLAINT**

WHEREAS, Plaintiff Sixto Castillo IV ("Plaintiff") filed a putative class-action complaint in the above-captioned action on October 13, 2015 (the "Complaint"), asserting claims arising under the Securities Exchange Act of 1934 and the rules promulgated thereunder against

the above captioned defendants;

WHEREAS, on November 13, 2015, Plaintiff filed an Affidavit of Service of a Summons and the Complaint stating that process was served on defendant 6D Global Technologies, Inc. ("6D") on November 9, 2015;

WHEREAS, undersigned counsel for 6D also represents defendants Tejune Kang, Mark Szykowski, Adam Hartung, David S. Kaufman, Terry McEwen, Anubhav Saxena, Adam Ware, Brian Warner, David Slovina, Gerard Casazza, Hilary Smith, Jason Porath, Kat Topaz, Mike Telatovich, Tandy Harris, Ray Robinson and TJ Iacofano (such defendants, together with 6D, collectively, the "Stipulating Defendants");

WHEREAS, counsel for the Stipulating Defendants and Plaintiff anticipate that the Court will appoint a lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the "Reform Act") and that such lead plaintiff will file an amended complaint;

WHEREAS, counsel for the Stipulating Defendants and Plaintiff believe that it would be premature and inefficient to respond to the Complaint by answer or motion prior to the appointment of a lead plaintiff and the filing of an amended complaint;

WHEREAS, counsel for the Stipulating Defendants intend to file a motion to dismiss the Complaint that will trigger an automatic stay of discovery under the Reform Act;

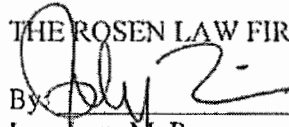
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff and the Stipulating Defendants as follows:

1. By their undersigned attorney, Stipulating Defendants hereby waive service of the summons and Complaint, provided that the Stipulating Defendants do not waive and shall not be prejudiced with respect to any claim or defense other than sufficiency of service of process;

2. Stipulating Defendants are not obligated to respond to the Complaint;
3. Within sixty (60) days following the entry of an order appointing a lead plaintiff, the lead plaintiff shall file an amended complaint;
4. Stipulating Defendants shall have sixty (60) days after service of an amended complaint to answer or otherwise respond to the amended complaint;
5. Lead plaintiff shall have forty-five (45) days after service of Stipulating Defendants' motion to dismiss, if any, to file a response in opposition;
6. Stipulating Defendants shall have thirty (30) days after service of lead plaintiff's response in opposition to file a reply;
7. The parties to this stipulation reserve all rights and defenses they may have, including jurisdictional defenses, as indicated above.

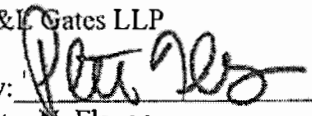
Dated: November ~~20~~²⁰ 2015

THE ROSEN LAW FIRM, P.A.

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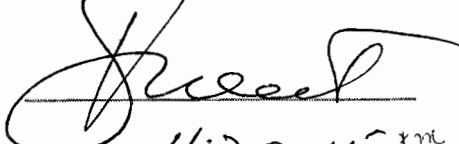
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Gerard Casazza, Hilary Smith, Jason Porath,
Kat Topaz, Mike Telatovich, Tandy Harris,
Ray Robinson and TJ Iacofano*

SO ORDERED:


11.20.15 *ENC*

Honorable Robert W. Sweet
United States District Judge